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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

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In Re: Yuliana Y Orozco	)	Case No.: 17-31463
	)	
	)	Chapter 13
	)	
Debtor(s)	)	Judge: A. Benjamin Goldgar

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NOTICE OF MOTION

TO: Yuliana Y Orozco, 4943 N Troy Street, Basement, Chicago, IL 60625 *via mail*

Trustee Marilyn Marshall, 224 S. Michigan Ave., #800, Chicago, IL 60604 *via ECF clerk's electronic delivery system*

U.S. Trustee, 219 S. Dearborn Suite 873, Chicago IL 60604 *via ECF clerk's electronic delivery system*

See attached service list

PLEASE TAKE NOTICE that on **June 19, 2018 at 9:30 a.m.**, I shall appear before the Honorable A. Benjamin Goldgar at the Dirksen Federal Court, 219 S. Dearborn, Courtroom 642, Chicago, Illinois 60604 or any judge presiding and then and there present the **Motion**, a copy of which is attached hereto.

By: /s/ David H. Cutler  
David H. Cutler

CERTIFICATE OF SERVICE

I, David H. Cutler, hereby certify that I caused to be served, electronically or through U.S. Mail, a copy of the foregoing Notice upon the parties named above on May 29, 2018 before the hour of 8:00 p.m.

By: /s/ David H. Cutler  
David H. Cutler, esq.  
Counsel for Debtor(s)  
Cutler & Associates, Ltd.  
4131 Main St.  
Skokie, IL 60076  
Phone: (847) 673-8600

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MOTION TO MODIFY PLAN POST CONFIRMATION

NOW COMES the Debtor, Yuliana Y Orozco (hereafter referred to as "the Debtor"), by and through her attorneys, The Law Offices of Cutler & Associates, Ltd., to present this Motion and state as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 USC 1334 and this is a "core proceeding" under 28 USC 157(b)(2).
2. The Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on October 20, 2017 and her Plan was confirmed on December 12, 2017.
3. The Debtor's confirmation Order provides for a plan payment of \$206 for 60 months with unsecured creditors receiving 25% of their unsecured claims.
4. The Debtor and her husband, who is the non-filing spouse have received \$2,719 for their tax refund for the 2017 tax year. The Debtor is not employed and is a homemaker, it is her non-filing spouse, her husband who is working.
5. The amount required for the Debtor to turnover is \$1,519.
6. The Debtor's tires needed to be replaced on her vehicle as it was unsafe for her to drive as she has 2 dependent children she transports to school and doctor visits. The Debtor spent \$741.36 on the tires for her vehicle. The bill for the tires is attached, see Exhibit A.

7. The Debtor's non-filing spouse suffers from periodontal disease and requires extensive dental surgery, two extractions, periodontal scaling and root planting, resin surfacing of the posterior and anterior molars, bicuspid and incisors. This dental surgery and treatment is necessary to protect his teeth from gum recession, and if not treated this can cause extensive damage to his bone structure and result in tooth loss and infection.
8. The Debtor's non-filing spouse does have dental insurance however they will only cover \$1,000 of the \$3,099 procedures, leaving the debtor's non-filing spouse to pay \$2,099 out of pocket. This is an extensive and necessary procedure that is beyond the normal expenses listed in the Debtor's schedules. Debtor has provided the treatment plan for her non-filing spouse from the Dental office, see Exhibit B.
9. The Debtor respectfully asks this Honorable Court permission to keep all of her 2017 tax refund to use on her non-filing spouse's dental work and vehicle expenses.

WHEREFORE, Debtor respectfully prays that this Court enter an Order allowing the Debtor to keep the entire tax refund for the year 2017 to pay for her non-filing spouses dental work and vehicle expenses; and for such other and further relief that this court deems just and proper.

Dated: May 29, 2018

Respectfully Submitted,

By: /s/ David H. Cutler  
David H. Cutler, esq.  
Counsel for Debtor(s):  
Cutler & Associates, Ltd.  
4131 Main St  
Skokie, IL 60076  
Phone: (847) 673-8600